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Rose Longoria <rose@yakama.com> 05/14/2007 04:02 PM

То	Sean Sheldrake/R10/USEPA/US@EPA
СС	· · · · · · · · · · · · · · · · · · ·
bcc	

Subject catch up on GASCO/Siltronic

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→ This message has been replied to.

Hi Sean!

Thanks for your email seeking Yakama's position on the GASCO / Siltronic Early Action. The only comment we had on the SOW was the information we submitted last month (see below). But in regards to Yakama's position, we are extremely supportive of EPA pursuing a "round 2" early action at this site. I have an 8am meeting but should be available at 9:30pm if you would like to touch base. I will be at my office... phone number 509-865-5121 x6365.

Thanks again for checking in...
~rose

----- Original Message ------

Subjec[Fwd: FW: Draft GASCO/Siltronic Early Action SOW for Review; your comments

t: requested by 5/1]

Date: Mon, 23 Apr 2007 17:24:27 -0700 **From:** Rose Longoria <rose@yakama.com>

To: Sean Sheldrake < Sheldrake. Sean@epamail.epa.gov>

CC: Sheila Fleming <sheila@ridolfi.com>

Hi Sean!

See below for Sheila's one comment/pt of clarification related to the GASCO/Siltronic EA SOW.

Also... in May of 2006, Yakama negotiated a 3 year budget with NW Natural for the GASCO site. The budget was very basic and specific to reviewing the remaining documents due in 2006 and review of the cap monitoring reports. Is NW Natural and/or Siltronic aware that EPA is going to require a new Early Action for the site? Yakama will need to negotiate a new funding agreement with both parties, but I don't want to approach them until EPA has initiated discussions with the companies.

I will be out of the office tomorrow but in on Wednesday. Maybe we can talk then...

~rose

----- Original Message -----

SubjectFW: Draft GASCO/Siltronic Early Action SOW for Review; your comments

: requested by 5/1



Date: Mon, 23 Apr 2007 16:19:46 -0700 **From:** Sheila Fleming <sheila@ridolfi.com> **To:** 'Rose Longoria' <rose@yakama.com>

Rose.

We have reviewed the Gasco/Siltronic SOW and have only one minor request for clarification.

Page 4, item number 4) and Page 7, item d state:

"Aqueous screening levels that are protective of ecological receptors and human health from direct contact with and ingestion of water media. These include but are not limited to those values listed in the EPA/ODEQ JSCS including human health and ecological Water Quality Criteria (WQC), Region 9 tapwater PRGs for human health, and MCLs."

It has been stated in recent Portland Harbor meetings that some of the values listed in the JSCS may be updated in the near future and that the Region 9 PRGs are no longer being updated and that Region 6 PRGs will be used instead. Should it be clarified in the SOW that the most recent version of the JSCS tables should be used?

Please let me know if you would like me to put this in an official memo format or if this email will suffice?

Thanks, Sheila

----Original Message----From: Sheldrake.Sean@epamail.epa.gov [mailto:Sheldrake.Sean@epamail.epa.gov] Sent: Wednesday, March 28, 2007 3:59 PM To: cyril.alex@deq.state.or.us; cyril.young@dsl.state.or.us; peterson.jennifer@deq.state.or.us; jeremy_buck@fws.gov; ANDERSON.Jim@deq.state.or.us; straughan.john@deq.state.or.us; Kemper McMaster@fws.gov; Kfellows@parametrix.com; mcclincy.matt@deq.state.or.us; bayuk.dana@deq.state.or.us; poulsen.mike@deq.state.or.us; Nancy.Munn@noaa.gov; pbattuello@parametrix.com; reopn@mindspring.com; aron.borok@EILTD.net; audiehuber@ctuir.com; BBarquin@hk-law.com; cunninghame@gorge.net; craig.christian@eiltd.net; chris.thompson@eiltd.net; erin.madden@gmail.com; jeff.baker@grandronde.org; jennifer.arthur@eiltd.net; jean.lee@envintl.com; Lisa.Bluelake@grandronde.org; howp@critfc.org; raygivens@givenslaw.com; rose@yakama.com; sheila@ridolfi.com; suzanne.miller@eiltd.net; tomd@ctsi.nsn.us: Valerie.lee@envintl.com; rick.j.kepler@state.or.us; rwadsworth@parametrix.com; Robert.Neely@noaa.gov; Steve.PURCHASE@state.or.us; gainer.tom@deg.state.or.us; cora.lori@epa.gov; davoli.dana@epa.gov; fuentes.rene@epa.gov; goulet.joe@epa.gov; Humphrey.Chip@epamail.epa.gov; Blischke.Eric@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; Rodriguez.Socorro@epamail.epa.gov; shephard.burt@epa.gov; smith.judy@epa.gov Subject: Draft GASCO/Siltronic Early Action SOW for Review; your comments requested by 5/1 Attached is the current draft SOW for a GASCO/Siltronic early action.

This early action is intended to remove PTM material located off the GASCO/Siltronic sites, including COCs associated with Siltronic operations. This early action responds to Siltronic's interest in performing an early action on their concerns, as well as those necessary to address for overall harborwide cleanup sequencing for GASCO.

I do know that staffing another early action is challenging, but I think the government team can rise to the occasion with respect to the GASCO/Siltronic site. Honestly, performing early cleanup at hot spots like Arkema and GASCO are necessary so that other harborwide cleanup work can proceed with less concern regarding recontamination. In essence, this is a form of source control necessary before the majority of remedial actions can begin.

These actions are also imperative to be responsive to the data in front of us, ie. this action is necessary to protect human health and the environment in a timely manner while the RI/FS and ROD are completed, post ROD AOCs/CDs are negotiated, etc..

As I've mentioned on a few prior TCT meetings--there are very few changes in this draft from the Arkema SOW. Many of the significant changes of the few are on pages 1-2:

A principal threat material is included, which will not be revisited during the ee/ca process. page1&2

Removal Action Area process specifics are included, but are not all

inclusive., page 1&2

Adding water column evaluation to the list of RAOs, page 1.

SLVs, page 4.

COIs, page 4.

Baseline surface water sampling specifics, page 10.

Exclusion on application of capping only as an alternative, page 10.

Additional language to address offsite tracking and cleanup measures, page 11.

Specifics on HASP problems related to diver PPE, page 14.

(See attached file: GASCO Siltronic SOW 3 07.doc)

Please let me know what comments and concerns you have, and if you would like to discuss in a meeting setting as well.

Thank you.

S

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